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8 **UNITED STATES DISTRICT COURT**
9 **WESTERN DISTRICT OF WASHINGTON**
10 **AT SEATTLE**

11 LENA ARMAS and ANDREA BLUM,
12 individually and on behalf of all others similarly
13 situated,

14 Plaintiff,

15 v.

16 REALPAGE, INC., GREYSTAR REAL ESTATE
17 PARTNERS, LLC, CH REAL ESTATE
18 SERVICES, LLC, LINCOLN PROPERTY CO.,
19 FPI MANAGEMENT, INC., MID-AMERICA
20 APARTMENT COMMUNITIES, INC.,
21 AVENUE5 RESIDENTIAL, LLC, EQUITY
22 RESIDENTIAL, ESSEX MANAGEMENT
23 CORPORATION, AVALONBAY
24 COMMUNITIES, INC., COMMUNITIES
25 MANAGEMENT, LLC, SECURITY
26 PROPERTIES INC., B/T WASHINGTON, LLC
27 d/b/a BLANTON TURNER, INDEPENDENCE
28 REALTY TRUST, INC., CUSHMAN &
WAKEFIELD, INC., BH MANAGEMENT
SERVICES, LLC, and UDR, INC., CAMDEN
PROPERTY TRUST, ESSEX PROPERTY
TRUST, INC., THRIVE 22

Defendants.

Civil Action No. 2:22-cv-01726-RSL

STIPULATED MOTION AND
ORDER SUSPENDING DEADLINE
FOR DEFENDANT CH REAL
ESTATE SERVICES LLC TO
RESPOND TO COMPLAINT

25 Pursuant to Local Civil Rules 7(d)(1), 7(j), and 10(g), Plaintiffs Lena Armas and Andrea
26 Blum (collectively, "Plaintiffs") and Defendant CH Real Estate Services LLC ("Carter-Haston"),
27 by and through their respective counsel, hereby stipulate as follows:
28

STIPULATION AND ORDER SUSPENDING DEADLINE FOR
DEFENDANT CH REAL ESTATE SERVICES LLC No. 2:22-
cv-01726

VENABLE LLP
600 MASSACHUSETTS AVENUE, NW
WASHINGTON, DISTRICT OF COLUMBIA 20001
(202) 344-4000

1 WHEREAS, Plaintiffs filed a Class Action Complaint (the “Complaint”) on December 6,
2 2022. ECF No. 1.

3 WHEREAS, Plaintiffs and certain other Defendants (“Stipulating Defendants”) entered
4 into stipulations that, for purposes of judicial efficiency, suspend the date for Stipulating
5 Defendants to answer, move to dismiss, or otherwise respond to the Complaint. ECF Nos. 51, 55,
6 68, 72.

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8 WHEREAS, the Court subsequently entered Orders that, *inter alia*, suspended the date for
9 Stipulating Defendants to respond to the Complaint and required the parties to submit a status
10 report by January 18, 2023. ECF Nos. 54, 56, 69, 73.

11 WHEREAS, on January 18, 2023, Plaintiffs and Stipulating Defendants submitted a joint
12 status report in which Plaintiffs requested that the Court suspend the deadline for Stipulating
13 Defendants to respond to the Complaint until after the Court resolves Plaintiffs’ pending Motion
14 to Consolidate (ECF No. 70) and Stipulating Defendants requested that the Court continue to
15 suspend the deadline until after the U.S. Joint Panel on Multidistrict Litigation rules on a pending
16 motion to centralize related actions. ECF No. 75. Those requests are pending.

17
18 WHEREAS, Plaintiffs and Carter-Haston believe that judicial efficiency would be served
19 by suspending the deadline for Carter-Haston to answer, move to dismiss, or otherwise respond to
20 the Complaint, so that Carter-Haston’s deadline is the same as Stipulating Defendants.

21
22 THEREFORE, the parties stipulate and agree to suspend the deadline for Carter-Haston to
23 answer, move to dismiss, or otherwise respond to the Complaint and request that the Court grant
24 the request so that the deadline for Carter-Haston’s response to the Complaint is the same deadline
25 as the Court sets for the Stipulating Defendants.

26 In making this stipulation, Carter-Haston does not waive, in this or any other action, any (i)
27 defenses or arguments for dismissal that may be available under Fed. R. Civ. P. 12; (ii) affirmative
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defenses under Fed. R. Civ. P. 8; (iii) other statutory or common law defenses that may be available; or (iv) right to seek or oppose any reassignment, transfer, or consolidated alternatives. Carter-Haston expressly reserves its rights to raise any such defenses (or any other defense) in response to either the Complaint or any original, amended, or consolidated complaint that may be filed in this or any other action.

STIPULATED to this 8th day of February, 2023.

s/ Steve W. Berman

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*Attorneys for Defendant
CH Real Estate Services LLC*

ORDER

THIS MATTER came before the Court on the parties' Stipulated Motion to Suspend the Deadline for Defendant to Respond to the Complaint. Now, therefore, IT IS HEREBY ORDERED THAT:

The deadline for Defendant CH Real Estate Services LLC to answer, move to dismiss, or otherwise respond to the Complaint is hereby suspended.

DATED this 9th day of February, 2023.



Robert S. Lasnik
United States District Judge

Presented by:

s/ Steve W. Berman

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